

10745-0018

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JEREMY JOHNSON,	)	
	)	
Plaintiff,	)	
	)	No. 2017 CV
vs.	)	
	)	Judge
RYDER TRUCK RENTAL, INC., RYDER	)	
TRANSPORTATION SERVICES, ARAMARK	)	
SERVICES, INC. AND ARAMARK UNIFORM &	)	
CAREER APPAREL, LLC.	)	
Defendants.	)	

**NOTICE OF REMOVAL OF CAUSE OF ARAMARK UNIFORM & CAREER  
APPAREL, LLC AND ARAMARK SERVICES, INC.**

Defendants Aramark Uniform & Career Apparel, LLC, a Delaware limited liability company, ("Aramark"), pursuant to 28 U.S.C. § 1446 and the Local Rules of the United States District Court for the Northern District of Illinois, notify this Honorable Court that the above-entitled cause has been removed from the Circuit Court of Cook County, County Department, Law Division, to the United States District Court for the Northern District of Illinois, Eastern Division, and in support, states as follows:

1. Plaintiff filed his complaint in the Circuit Court of Cook County, Illinois, Law Division, on May 10, 2017 claiming that he sustained injuries on May 12, 2015 when he fell off a loading dock when a Ryder truck moved away from the loading dock. *See* Plaintiff's Complaint attached as Exhibit A. Plaintiff's complaint alleges that defendants were negligent for failing to maintain and inspect the truck and failing to warn him. *Id.*
2. Aramark's registered agent was served with Plaintiff's summons and complaint on May 12, 2017. *See* Service of Process Transmittal attached as Exhibit B.

3. Upon information and belief, Plaintiff is citizen of Indiana and his complaint alleges that he is a resident of the City of East Chicago, State of Indiana. *See* Ex. A, ¶ 1.

4. Aramark Uniform & Career Apparel, LLC. is a Delaware limited liability company with its principal place of business in Burbank, CA. Aramark Services, Inc. is a Delaware Corporation with its principal place of business in Philadelphia, PA.

5. Aramark Services, Inc. is 100% owned by Aramark Intermediate HoldCo Corporation, which is a Delaware corporation with its principal place of business in Pennsylvania. Aramark Intermediate Holdco is 100% owned by Aramark Holdings Corporation, which is a Delaware corporation with its principal place of business in Pennsylvania. Aramark Uniform & Career Apparel, LLC is a wholly-owned subsidiary of Aramark Uniform & Career Apparel Group, Inc., which is a Delaware corporation with its principal place of business in Pennsylvania. Aramark Uniform & Career Apparel Group, Inc. is a wholly-owned subsidiary of Aramark Services, Inc., which is a Delaware Corporation with its principal place of business in Philadelphia, PA. Aramark Intermediate HoldCo Corporation, a Delaware Corporation with its principal place of business in Philadelphia, PA. owns 100 percent of Aramark Services, Inc.

6. Upon information and belief, Plaintiff will be seeking damages in excess of \$75,000, exclusive of interest and costs, based upon the allegations in his complaint which seek damages in excess of \$50,000 for personal and pecuniary injuries sustained by him as a direct result of the accident. *Id.* at Ex. A,

7. Consequently, proper diversity of citizenship exists between the parties as required under 28 U.S.C. § 1332, and the amount in controversy in this case is believed to exceed the jurisdictional limit of \$75,000.00, exclusive of interest and costs.

8. The requisite elements of jurisdiction have been satisfied and diversity of the parties exists which entitles Aramark to remove this action to the United States District Court for the Northern District of Illinois, Eastern Division, pursuant to 28 U.S.C. §§ 1332 and 1446.

WHEREFORE, Defendants Aramark Uniform & Career Apparel, LLC, and Defendant Aramark Services, Inc., notify this Court that this cause has been removed from the Circuit Court of Cook County, Illinois, County Department, Law Division, to the United States District Court for the Northern District of Illinois, Eastern Division, pursuant to the provisions of 28 U.S.C. § 1446 and the Local Rules of the United States District Court of the Northern District of Illinois.

Respectfully submitted,  
**Aramark Uniform & Career Apparel,  
LLC and Aramark Services, Inc.**

By: //Jack Shanahan  
One of their Attorneys

Jack Shanahan  
Paul Tsukuno  
Inman & Fitzgibbons, Ltd.  
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Suite 1825  
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Attorney Id. No.: 6193918 (Shanahan)  
Attorney Id. No.: 2862492 (Tsukuno)

**CERTIFICATE OF SERVICE**

The undersigned, a non-attorney, certifies that a true and correct copy of the foregoing instrument was served on the attorney of record at his respective business addresses indicated below:

***Sherwood Law Group  
218 North Jefferson Street Suite 401  
Chicago, IL, 60661  
Attorneys for Plaintiff***

via ☐ hand delivery, ☐ facsimile, ☐ overnight-next day delivery, \_\_\_ electronic mail and/or ☒ depositing same in the US Mail at 33 North Dearborn, Suite 1825, Chicago, Illinois 60602, with proper postage prepaid, at or before the hour of 5:00 p.m., on this 18 day of May 2017.

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[X]Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.